

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO: 22-CR-20497

-vs-

HON. PAUL D. BORMAN

D-2 KYRELL ALLEN,

Defendants.

_____ /

FIRST SUPERSEDING INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(18 U.S.C. § 2119 - *Carjacking*)

D-2 KYRELL ALLEN

On or about September 18, 2022, in the Eastern District of Michigan, Southern Division, defendant KYRELL ALLEN, with the intent to cause death and serious bodily harm, took a 2021 Ford F-150 that had been previously shipped in interstate commerce, from the person and presence of another, and did so by force and violence, and intimidation, all in violation of Title 18, United States Code, Sections 2119 .

COUNT TWO

*(18 U.S.C. § 924(c) – Use and Carry of a Firearm During
and in Relation to a Crime of Violence)*

D-2 KYRELL ALLEN

On or about September 18, 2022, in the Eastern District of Michigan, Southern Division, defendant KYRELL ALLEN used and carried a firearm during and in relation to a crime of violence for which the defendant KYRELL ALLEN may be prosecuted in a court of the United States, that is, Carjacking as alleged in Count One of this First Superseding Information; all in violation of Title 18, United States Code, Sections 924(c)(1)(A).

FORFEITURE ALLEGATIONS

**(18 U.S.C. 982(a)(5); 18 U.S.C. § 924(d)
together with 28 U.S.C. § 2461)**

1. The allegations contained in Counts One through Two of this First Superseding Information are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(5) and Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

2. Upon conviction of the offense charged in Count One of this First Superseding Information, defendant KYRELL ALLEN shall forfeit

to the United States: (a) any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violation, pursuant to Title 18, United States Code, Section 982(a)(5); and (b) any firearm and ammunition involved in or used in such violation, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

3. Upon conviction of the offense charged in Count Two of this First Superseding Information, defendant KYRELL ALLEN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461, any firearm and ammunition involved in or used in defendant's knowing violation of the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot
be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

DAWN N. ISON
United States Attorney

s/ Craig Wininger
CRAIG WININGER
Chief, Violent and Organized Crime Unit

s/ Jeanine Brunson
JEANINE BRUNSON
Assistant U.S. Attorney

Dated: May 16, 2023

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 22-CR-20497
--	----------------------------------	-----------------------------------

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: s/ J.B.

Case Title: USA v. D-2 KYRELL ALLEN

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☒ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 22-CR-20497 **Judge:** Paul D. Borman

- ☐ Corrects errors; no additional charges or defendants.
☒ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
KYRELL ALLEN	18 U.S.C. § 2119, 18 U.S.C. § 924(c)	22-mj-30408

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 16, 2023
Date

s/Jeanine Brunson
 Jeanine Brunson
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226
 Fax: 313-226-3265
 E-Mail address: Jeanine.Brunson@usdoj.gov
 Attorney Bar #: P55429

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.